



January 28, 1994

J. P. Andre' Reports Analyst Reports Analysis Division FEDERAL ELECTION COMMISSION Washington, D.C. 20463

Identification No. C00286922

Dear J. P. Andre":

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This letter is in response to your correspondence of January 1994 regarding our recently submitted Statement of Organization. More particularly, I am addressing my response to your inquiry with respect to our affiliation with Blue Cross and Blue Shield of Maryland, Inc. ("BCBSM").

The members of this PAC are, by definition, employees of an entity licensed in the State of Maryland as a non-profit health insurance company. In my opinion, our only real association with that entity is that we are employees of BCBSM and, generally speaking, share with it a common interest in political matters that affect the health care industry, as well as other political issues that may impact our individual members specifically. Otherwise, we maintain ourselves as an autonomous organization created and existing for the furtherance of our common interests and purposes.

The use of the term "affiliation" in this instance, in my opinion, is probably a misnomer in its application to up and as supported by the CFR Section recited by you in your previous correspondence. Upon further reflection, I probably should not have made the statement. However, having done so, I can certainly understand your need for further clarification. I trust that my response will satisfactorily explain our relationship ("affiliation") with BCBSM and you will find this explanation supportive of our request for registration as a Federal PAC.

Should you need any further explanation or comment on this subject, please do not hasitate to contact me.

Sincerely,

John A. Sweeney

BCBSM Employee's PAC Treasurer

(410) 999-5088

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STATEMENT OF ORGANIZATION

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## Federal Election Commission

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